

**THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civ. Action No. 19-cv-08655(LGS)(GWG)

**DECLARATION OF ULKU ROWE IN SUPPORT OF PLAINTIFF'S  
MOTION FOR SUMMARY JUDGMENT AND OPPOSITION TO DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT**

I, Ulku Rowe, hereby declare, based on personal knowledge and under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a woman and reside in New York.
2. Both of my academic degrees are considered computer engineering degrees.
3. I have over 26 years of direct experience related to computer engineering, including, but not limited to, managing and directing the innovation, engineering, production, and development of computer software, databases, and other tools, primarily for clients in the financial services industry.
4. At the time Google hired me, I had 22 years of relevant technical and executive experience, including two years when I was pursuing my MS degree and working for a bank in Turkey in a technical role and as a Research Assistant for Caterpillar, Inc.
5. Prior to joining Google, I was as a Managing Director at JPMorgan Chase ("JPMorgan"), where I held the title of Global Head and Chief Technical Officer ("CTO") of Credit Risk Technology for JPMorgan from September 2012 to March 2017.

6. My role as CTO for JPMorgan involved navigating and integrating relevant Cloud technologies, as well as leading the team responsible for AWS cloud migration of risk systems at JPMorgan. In this role, I was directly responsible for strategy, design, product management, engineering, testing, support, and day to day management of the entire technology platforms globally.

7. As a CTO at JPMorgan, I led the migration of risk systems to the cloud, was responsible for the global technology platforms for managing JPMorgan's credit risk across all lines of businesses, globally—the world's largest financial services portfolio with \$3.7 trillion in total assets and \$129 billion revenue.

8. Based on my personal knowledge, JPMorgan recruited me as a “game-changer” technology leader to build the next-generation risk management systems for JPMorgan to enable them to scale up their business growth, ensure regulatory compliance, and bring in technical innovation.

9. At JPMorgan, I advocated for the public cloud, was a member of JPMorgan's Cloud strategy council, and was an advisor to the COO on the Company's cloud strategy.

10. At JPMorgan, I acquired significant cloud experience, primarily with Amazon Web Services, a Google Cloud Platform (“GCP”) competitor. GCP did not exist prior to 2008 and, once introduced, was not seen as a major player in financial services.

11. From August 2009 to June 2012, I was a Managing Director at Bank of America Merrill Lynch, where I held the title of Global Head of Market Risk Technology.

12. At Bank of America, I was responsible for the global technology platforms managing the bank's market risk across all its businesses, countries, and asset classes – the world's second largest financial services portfolio with \$2.5 trillion in total assets. I also led a

global, diverse team of 350+ engineers, product managers, business analysts, testers, and support personnel across multiple locations in the US, Europe, and Asia.

13. Prior experience in applied AI and machine learning is not a requirement for hire or requisite skill needed to perform the Technical Director role.

14. In the Technical Director role, I have made significant contributions to the Google Cloud organization and platform, advised on large-scale deals for Google Cloud, and worked directly with Google Cloud's senior leadership on high profile initiatives.

15. As a Technical Director, I leveraged my experience managing software engineering teams to make an immediate impact on the roadmap for Google Cloud's products, and created business opportunities and provided feedback on product development.

16. In addition to my independent contributions, I have collaborated and worked alongside my male peers in the Technical Director role on engineering and product development initiatives that have been acknowledged, promoted, and publicized by Google.

17. I possess the technical skills associated with the work performed by a computer engineer, including coding ability.

18. Before interviewing for the Technical Director role, Google interviewed me for a Software Engineering ("SWE") Director role.

19. Google did not ask me to submit code for review during the application process for the SWE Director role.

20. Based on my personal knowledge and observation, Technical Directors and SWE Directors both serve as technical leads or advisors on Google technology products that Google Cloud sells to customers—products like databases, networking, and storage.

21. In my experience, while Technical Directors do not unilaterally build or develop products for Google Cloud, Technical Director were hired based on their familiarity and past experience overseeing teams carrying out these responsibilities and therefore understood how to advise both customers and Google's internal teams on product development.

22. Based on my personal knowledge and observation, contributing code to Google Cloud products is not a primary job responsibility of Technical or SWE Directors.

23. Based on my personal knowledge and observation, both Technical and SWE Directors use their expertise to ensure Google products meet the needs of clients.

24. Based on my personal knowledge and observation, Google requires both Technical and SWE Directors to have technical depth, strategic product development and systems design experience, and coding ability.

25. I have observed that SWE Directors possess substantially similar understanding of Google's products to that of Technical Directors, including but not limited to databases, networking, and storage and consistently collaborate with internal and external stakeholders to solve technical problems, translate product design and delivery, and develop innovative solutions and products.

26. Based on my personal knowledge and observation, Technical and SWE Directors are highly technical strategic leaders with cross product impact.

27. While the work of AE Directors is primarily focused on internal product development, in my experience in Google Cloud, the software development process is similar for internal and external products and follows the same process of coding, integrating, testing, and support.

28. During my employment in Google Cloud, I have observed that many of Google Cloud's products have started as internal products that are later offered externally, such as BigQuery, Spanner, and Kubernetes, which are the flagship products of the Google Cloud portfolio and were internal products before being packaged as external products.

29. In my experience, the Engineering ("Eng") Director processes and standards are not distinguishable, and are distinctly different from the processes and standards applied to non-Eng roles like Sales, Marketing, HR, and other roles. All Eng Directors, including SWE, AE, PM, and Technical Directors, work collaboratively across teams and meet regularly, including during quarterly summits like the Tech Leadership Summit, to discuss strategic developments and the work being performed by Eng Directors across Google Cloud.

30. During the time I reported to Tariq Shaukat, he never brought me to client meetings with him, although I observed him ask my male colleagues to attend customer meetings with him.

31. As a result of Mr. Shaukat's limited communication with me, I did not have adequate insight on his strategy or overall vision for the GCTL role or the organization.

32. Given the smaller scope, non-financial services focus, and less external facing characteristics of the three options offered by Mr. Shaukat, I viewed each as a demotion.

Dated: December 6, 2021  
New York, New York

Respectfully submitted,

By   
Ulku Rowe

**This document was signed by:**

Ulku Rowe



**Vinesign**

Date 12/6/2021 8:44 PM UTC

Phone

IP Address 172.58.229.57

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